

Phase I Environmental Site Assessment

MCF Bolton Site 12 Carpenter Road Bolton, Connecticut

CHA Project Number: 14957.1002.1102

Prepared for:

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February 9, 2006

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FIGURES

FIGURE 1: Site Location Map
 FIGURE 2: Site Plan

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APPENDIX A: Site Photographs
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EXECUTIVE SUMMARY

The purpose of this Phase I ESA was to identify recognized environmental conditions, as defined by the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05, associated with the subject site. CHA has performed this Phase I ESA in general conformance with the scope and limitations of ASTM Standard Practice E 1527-05. The Phase I ESA Report has been prepared by CHA to: provide a general description of the subject site, any structures occurring thereon, and the site vicinity; discuss the current and historical usage of the property; and identify the presence or absence of recognized environmental conditions in connection with the subject site, based upon the results of historical and regulatory records reviews, interviews, and a site inspection.

The subject site consists of an approximately 100' x 100' wooded area on the eastern side of a 43.3 acre residential parent parcel. The site also includes a 20' wide access and utility easement from the site north to a paved parking lot associated with the apartment building located on the parent parcel. The parking lot is accessed from Carpenter Road. Utilities servicing the parent parcel consist of only electricity via overhead lines. The host property is bounded by Carpenter Road to the north, Bolton Center Road to the east, the Town of Manchester Water Department property and the I-384 highway to the south and southwest, and rural residential lands to the west. Historic research indicated that there have been no structures on the subject site and that the parent parcel has been used for residential purposes since the late 1950s. Prior to that time, the land was a portion of a berry farm.

The review of State and Federal regulatory databases indicated that neither the subject site nor parent parcel are listed in any of the databases searched for this investigation. Review of the regulatory database report indicated that there were a limited number of facilities/incidents reported within the specified search radii of the subject site. However, these facilities/incidents were all located at much lower elevations than the subject site, and as a result, it is not expected that the listed facilities/incidents have impacted the subject site or its intended use by MCF Communications.

This environmental assessment pertaining to the subject site identified as the MCF Bolton Site, located at 12 Carpenter Road in the Town of Bolton, Tolland County, Connecticut revealed no evidence of recognized environmental conditions to be associated with the subject site. As a result, no further environmental investigations are recommended at this time.

1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this assessment was to identify recognized environmental conditions, as defined by the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05, associated with the subject site. The term *recognized environmental conditions* is defined by ASTM as the presence or likely presence of any hazardous substance or petroleum products on a property under conditions that indicate an existing release, past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term *recognized environmental conditions* is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment.

1.2 SCOPE

The Phase I ESA Report has been prepared by CHA to: provide a general description of the subject site, any structures occurring thereon, and the site vicinity; discuss the current and historical usage of the property; and identify the presence or absence of recognized environmental conditions in connection with the subject site, based upon the results of historical and regulatory records reviews, interviews, and a site inspection.

1.3 VALIDITY

CHA has performed this Phase I ESA in general conformance with the scope and limitations of ASTM Standard Practice E 1527-05.

2.0 SITE DESCRIPTION & PHYSICAL SETTING

2.1 SIZE

The subject site consists of an approximately 100' x 100' area on the eastern side of a 43.3 acre wooded and residential parent parcel.

2.2 LOCATION

The subject site is located to the south of the residential building located at 12 Carpenter Road in the Town of Bolton, CT. The subject site is surrounded by woods on all sides. The parent parcel is bordered by Carpenter Road to the north, Bolton Center Road to the east, Town of Manchester Water Department property and the I-384 highway to the south/southwest, and wooded residential land to the west. The site location has been depicted on Figure 1, Site Location Plan. The subject site is located within a rural residential area.

2.3 PROPOSED USE/DEVELOPMENT

The proposed use and/or development of the subject site is development as a telecommunications compound including the installation of a tower (specifications are unknown at this time) designed for four carriers, MCF equipment cabinets on a 5' x 10' concrete slab. The yard surface will be covered by a crushed stone treatment and the yard will be enclosed by a six foot chain link fence. A 20' wide gravel access road will be constructed from the subject site north to Carpenter Road (Photo 2).

2.4 EXISTING FEATURES

The subject site is vacant undeveloped wooded land (Photo 1) on the south side of a four-unit residential structure.

2.5 NEIGHBORING PROPERTIES

The subject site is located in a rural residential area. The site is bounded by the features and uses indicated below.

- North – Carpenter Road, residences
- South – Woods leading to the I-384 highway
- East – Woods leading to residences along Bolton Center Road
- West – Undeveloped wooded land

2.6 TOPOGRAPHY & ELEVATION

The USGS, 7.5 Minute Series Topographic Map, Rockville Quadrangle, indicates that the approximate elevation of the subject site is 568 feet above mean sea level (AMSL). The subject site is located at a high point with topography sloping downward from the site in all directions. No unusual topographic features were noted on the subject site or parent parcel at the time of the site inspection.

2.7 GEOLOGY & HYDROLOGY

The USDA Soil Survey for Tolland County indicates that the soils of the subject site are classified as Paxton fine sandy loam. This soil type consists of well drained soils with moderately fine textures. Subordinate soil types consist of similar materials.

The actual direction of groundwater flow beneath the subject site has not been physically verified; however, based on regional topography, groundwater in the area of the subject site is assumed to flow generally to the north/northwest. Surface runoff also appears to be directed via natural topography away from the site in any direction.

There was no evidence of wetlands identified at the subject site at the time of the site inspection.

2.8 RADON

According to the USEPA Radon database the average basement radon level in the area of the subject site is 2.325 pCi/l. The Federal recommended continuous exposure level is 4.0 pCi/l.

3.0 SITE HISTORY

Based upon the review of standard historical references such as aerial photographs, Sanborn Fire Insurance Maps, city directories, and/or historic topographical maps, local governmental records, and/or previous environmental investigation reports, CHA has determined that the property upon which the subject site is located has been undeveloped wooded land since the late 1950s. Prior to that time, the subject site was a portion of lands of a berry farm.

3.1 CLIENT PROVIDED INFORMATION

No specific site information was provided to CHA by MCF Communications.

3.2 STANDARD HISTORICAL SOURCES

A review of readily available historical references was performed to determine past property usage. The results of the research are summarized below and copies of the referenced materials are included in Appendix B.

Title Deeds

The owner of record is Terry Veo who purchased the property in October 1996. No further title information was provided to CHA during the course of this investigation.

Sanborn Fire Insurance Maps

A Sanborn Fire Insurance Map Report was provided by Environmental Data Resources, Inc. (EDR). The report indicated that there was no Sanborn Map coverage for the area of the subject site.

Aerial Photographs

An aerial photograph, dated April 1990, was obtained from TerraServer.com, a copy of which had been included in Appendix B. The subject site appeared as undeveloped wooded land and the northeastern corner of the parent parcel was developed with two residential structures.

City Directories

There were no city directory listings for the host property.

Historical Topographic Maps

Historic topographic maps for the Rockville Quadrangle, dated 1984, 1972, and 1967, were provided by EDR. The subject site was depicted as unimproved land in all of the topographic maps.

3.3 LOCAL GOVERNMENT OFFICES

Town of Bolton Assessor's Office

The Town of Bolton Assessor's Office provided the following information relative to the parent parcel:

- Tax Parcel ID Map 6, Block, Lot 11.
- 43.3 acres of residentially zoned land.
- The parent parcel utilizes a private water supply and private septic system.
- The parent parcel is improved with a two-story, four-unit apartment house built in 1954.

Town of Bolton Building Department

The Building Department indicated that there were no files for the parent parcel.

3.4 PREVIOUS ENVIRONMENTAL INVESTIGATIONS

No reports of previous environmental investigations for the subject site were made available to CHA during the course of this project.

3.5 SITE CONTACT INTERVIEW

Ms. Terry Veo, the property owner, was interviewed via telephone on February 9, 2006. Ms. Veo stated that the subject site was wooded unimproved land at the time of her purchase in 1996 and has remained as such since that time. She further stated that there has been no dumping or burial of materials on the subject site. There have been no underground or aboveground storage tanks formerly or currently associated with the subject site. There have been no spills or releases reported for the subject site.

Ms. Veo has in her possession an older aerial photograph, of unknown date, that depicts the parent parcel as a farm. Ms. Veo stated that the area of the subject site was observed to be a clearing surrounded by trees and brush. There were no structures or improvements observed at the site.

4.0 CURRENT ENVIRONMENTAL CONDITIONS

On January 19, 2006, CHA conducted an inspection of the subject site. The site was examined, photographs were taken (Appendix A), and neighboring land uses were noted. The results of the inspection are detailed below.

Tanks: There was no evidence of underground or aboveground storage tanks observed on the subject site at the time of the site inspection.

Chemicals/Hazardous Materials: There was no evidence of hazardous materials or chemicals observed on the subject site at the time of the site inspection.

PCBs: There was no evidence of aged electrical equipment likely to contain PCBs observed on the subject site at the time of the site inspection.

Pits, Ponds, & Lagoons: There were no pits, ponds, or lagoons observed on the subject site at the time of the site inspection.

Stressed Vegetation: There was no evidence of stressed vegetation on the subject site at the time of the site inspection.

Staining: There was no staining observed on the subject site at the time of the site inspection.

Chemical Odors: There were no odors noted on the subject site at the time of the site inspection.

Solid Waste Disposal: There was no waste disposal noted on the subject site at the time of the site inspection.

Waste Water: No waste waters were generated at the subject site at the time of the site inspection.

Wells & Water Supply: There were no water wells or water supply wells observed on the subject site at the time of the site inspection.

Lead-Based Paint: There were no lead-based paint issues identified at the subject site at the time of the site inspection.

Suspect Asbestos-Containing Materials: There were no asbestos issues identified at the time of the site inspection.

5.0 REGULATORY DATABASE REVIEW

Environmental regulatory agency records were searched through the use of State and Federal databases accessed and summarized through the services of EDR. The databases searched and their respective search radii are as follows:

- Federal NPL list, active and de-listed(1.0 mile)
- Federal CERCLIS list and No Further Remedial Action Planned list (0.5 miles)
- Federal RCRA TSDF Corrective Actions list (1.0 mile)
- Federal RCRA TSDF Non-Corrective Action list (0.5 miles)
- Federal RCRA hazardous waste generator list (0.25 miles)
- Federal Emergency Response spill list (target property)
- Federal Engineering and Institutional Control Sites (0.5 miles)
- Department of Defense sites (1.0 mile)
- Federal Brownfields sites (0.5 miles)
- State list of hazardous waste sites (1.0 mile)
- State list of solid waste sites (0.5 miles)

- State registry of petroleum and chemical underground storage tank facilities (0.25 miles)
- State leaking underground storage tank registry (0.5 miles)
- State spills inventory (0.5 miles)
- Institutional control sites, voluntary cleanup sites, and State Brownfield sites (0.5 miles)
- Tribal Records (1.0 mile)
- Coal Gas sites (1.0 mile)

The information contained in the EDR report is summarized below, and a copy of the regulatory database report is included in Appendix C.

Subject Site: The subject site and parent property were not listed in any of the databases searched for this investigation.

Adjacent Properties/Site Vicinity: Incidents/facilities identified within specified search radii of the subject site are listed below. Details specific to each listing are contained in the EDR report in Appendix C. It should be noted that all of the listed incidents/facilities are located at lower elevations than the subject site, and as a result, are not expected to impact the subject site.

- Mike's Citgo, 1135 Boston Turnpike – LUST 2/15/94, status recorded; spill 6/20/99, gasoline, closed
- 22 Carpenter Road – spill 4/9/05, transformer oil, closed
- 14 Carpenter Road – spill 12/15/98, fuel oil, closed
- 10 Riga Lane – spill 6/25/04, fuel oil, closed
- 94 Finley Street – spill 6/11/04, oil, closed
- Route 44 gas station – contaminated well
- 65 Finley Street – spill, date unrecorded, fuel oil, closed
- 55 Finley Street – spill 8/3/93, chlorodane, contained and closed
- Syndet, address unrecorded – former industrial chemical discharge to ground
- 129 Bolton Turnpike – spill 7/9/00, gasoline, closed
- 1121 East Middle Turnpike – State discovery and assessment site, hydrocarbons and/or fuel oil release, status unrecorded
- CTDOT salt storage – registered covered salt storage facility

6.0 OPINIONS/CONCLUSIONS/RECOMMENDATIONS

CHA has performed this Phase I ESA in general conformance with the scope and limitations of ASTM Standard Practice E 1527-05. Any exceptions to, or deletions from, these practices are described in Section 1.0 of this report.

6.1 OPINIONS

CHA presents the following opinions based on the research and field observations made at the time of the site inspection:

- The subject site is a 100' x 100' wooded area on the eastern side of a residentially zoned lot. There were no on-site sources of contamination identified during this investigation.
- There were no off-site sources of contamination identified during this investigation.
- There did not appear to be any significant data gaps encountered which hindered CHA's ability to evaluate or identify recognized environmental conditions associated with the subject site.

6.2 CONCLUSIONS

This Phase I ESA pertaining to the subject site identified as the MCF Bolton Site located at 12 Carpenter Road in the Town of Bolton, Tolland County, Connecticut, revealed no evidence of recognized environmental conditions to be associated with the subject site.

6.3 RECOMMENDATIONS

Based on the conclusions presented above, no additional environmental investigations are recommended at this time.

7.0 RESOURCE SUMMARY

In compiling the report summarizing this investigation, the following persons/agencies were interviewed and/or contacted and resources checked.

Environmental Data Resources, Inc.: Radius Report with GeoCheck, dated 2/7/06, contains regulatory database search findings, soils and geologic information, elevation information, radon information; Sanborn Map Report, dated 2/6/06; City Directory Abstract, dated 2/7/06; Historic Topographic Map Report, dated 2/8/06.

Town of Bolton Municipal Offices: Assessor and Building Department contacted via telephone 2/9/06.

Aerial Photograph: Photo dated April 1990 obtained from TerraServer.com via Inter-net 2/9/06.

Ms. Terry Veo: Property owner, interviewed via telephone 2/9/06.

8.0 LIMITATIONS

This investigation was not intended to represent an exhaustive research of all potential hazards which may exist. The conclusions presented in this report are based on information gathered in accordance with the Scope of Services defined in Section 1.0 of the report. This report is not intended to assess the condition of the subsurface environment at the site or purport to be representative of future site conditions or events. All conclusions reflect observable conditions existing at the time of the site inspection (January 19, 2006). Information provided by the resources referenced in Section 7.0 was utilized in assessing the site. The accuracy of the

conclusions drawn from this investigation is, therefore, dependent upon the accuracy of information provided.

9.0 QUALIFICATIONS & CERTIFICATION


This Phase I ESA was performed by a qualified environmental scientist employed by Clough, Harbour & Associates LLP (CHA). CHA, a full service engineering consulting firm with offices throughout the eastern United States, has the resources and the capabilities to perform Phase I ESAs. The individuals responsible for the preparation of this report meet the definition of an *Environmental Professional* as defined by Section 3.3.11 of the American Society for Testing and Materials (ASTM) Standard Practice 1527-05.

This report has been prepared expressly for the use of MCF Communications, Inc. No other parties are entitled to rely upon this report unless our express written consent is first obtained. All conclusions drawn were based on CHA's review of available historical, regulatory, and site specific information pertaining to this project. Recommendations were submitted based on CHA's knowledge, experience, and professional judgement concerning Phase I ESAs.

ESA Completed By:

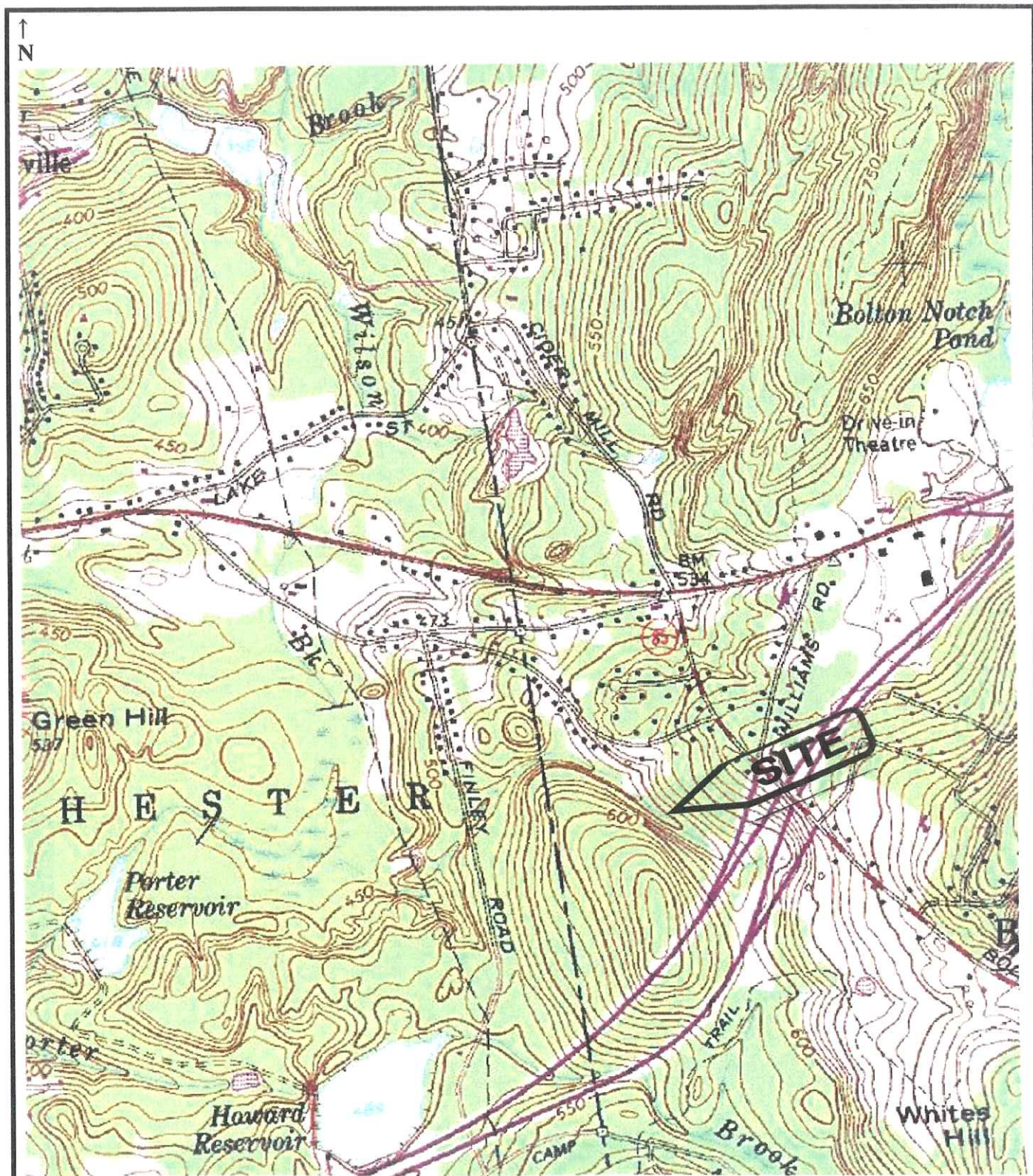
Rogina M. Camilli
Project Scientist

ESA Report Reviewed By:



Keith J. Ziobron, P.E.
Associate

FIGURES



CHIA

CLOUGH HARBOUR & ASSOCIATES LLP

TOPO QUAD: Rockville, CT
SCALE: 1:24,000

Project # 14957.1002.1102
DATE: February 2006

FIGURE 1
SITE LOCATION MAP
MCF Bolton Site
12 Carpenter Road
Bolton, Connecticut

APPENDIX A
SITE PHOTOGRAPHS



Photo 1 – Compound location, tower at stake



Photo 2 – Typical of access road corridor

APPENDIX B

HISTORICAL RESOURCES



EDR® Environmental
Data Resources Inc

"Linking Technology with Tradition"®

Sanborn® Map Report

Ship To: Rogina Camilli
Clough, Harbour &
3 Winners Circle
Albany, NY 12205

Order Date: 2/6/2006 **Completion Date:** 2/7/2006

Inquiry #: 1608224.17

P.O. #: 14957

Site Name: MCF Bolton

Address: 12 Carpenter Road

City/State: Bolton, CT 06043

Customer Project: 14957

1013959PVC 518-453-4569

Cross Streets:

This document reports that the largest and most complete collection of Sanborn fire insurance maps has been reviewed based on client supplied information, and fire insurance maps depicting the target property at the specified address were not identified.

NO COVERAGE

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report AS IS. Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

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The EDR-City Directory
Abstract

**MCF Bolton
12 Carpenter Road
Bolton, CT 06043**

Inquiry Number: 1608224.18

Tuesday, February 07, 2006

**The Standard in
Environmental Risk
Management Information**

**440 Wheelers Farms Road
Milford, Connecticut 06461**

Nationwide Customer Service

**Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com**

City Directory Abstract

Environmental Data Resources, Inc.'s (EDR) City Directory Abstract is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Abstract includes a search and abstract of available city directory data. The city directory is a sophisticated tool for locating individuals and businesses. With each address, the directory lists the name of the corresponding occupant.

References

To meet the prior use requirements of ASTM E 1527-05, Section 8.3.2, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-05, Section 8.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. ASTM E 1527-05 requires *"All obvious uses of the property shall be identified from the present, back to the property's first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary and both reasonably ascertainable and likely to be useful."* (ASTM E 1527-05, Section 8.3.2) *Reasonably ascertainable means information that is publicly available, obtainable from a source within reasonable time and cost constraints, and practically reviewable.*

EPA's Standards and Practices for All Appropriate Inquiries (AAI), Section § 312.24, identifies the historical sources of information necessary to achieve the objectives and performance factors of § 312.20. According to AAI, *"historical documents and records may include, but are not limited to, aerial photographs, fire insurance maps, building department records, chain of title documents, and land use records."*

Data Gaps

In order to address data gaps, additional sources of information may be consulted. According to the AAI, Section § 312.20 (g), *"to the extent there are data gaps (as defined in § 312.10) in the information developed...that affect the ability of persons (including the environmental professional) conducting the all appropriate inquiries to identify conditions indicative of releases or threatened releases...such persons should identify such data gaps, identify the sources of information consulted to address such data gaps, and comment upon the significance of such data gaps."* According to ASTM E 1527-05, Section 8.3.2.3, *"historical research is complete when either: (1) the objectives in 8.3.1 through 8.3.2.2 are achieved; or (2) data failure is encountered. Data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met....If data failure is encountered, the report shall document the failure and, if any of the standard historical sources were excluded, give the reasons for their exclusion."*

Thank you for your business.

Please contact EDR at 1-800-352-0050
with any questions or comments.

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SUMMARY

■ *City Directories:*

This document reports that Environmental Data Resources, Inc. (EDR) searched select national repositories of business directories, and, based on client-supplied Target Property information, business directories including the Target Property information were not deemed reasonably ascertainable (refer to ASTM E1527-00, Section 3.3.30) by EDR. This **No Coverage** determination reflects a search only of business directory repository collections which EDR accessed. It can not be concluded from this search that no coverage for the Target Property exists anywhere, in any collection.

No Coverage

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EDR Historical Topographic Map Report

**MCF Bolton
12 Carpenter Road
Bolton, CT 06043**

Inquiry Number: 1608224.16

February 08, 2006

The Standard in Environmental Risk Management Information

**440 Wheelers Farms Road
Milford, Connecticut 06460**

Nationwide Customer Service

Telephone: 1-800-352-0050

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EDR Historical Topographic Map Report

Environmental Data Resources, Inc.'s (EDR) Historical Topographic Map Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR Historical Topographic Map Report includes a search of available public and private color historical topographic map collections. For more than a century, the USGS has been creating and revising topographic maps for the entire country at a variety of scales. There are about 60,000 U.S. Geological Survey (USGS) produced topographic maps covering the United States.

References

To meet the prior use requirements of ASTM E 1527-05, Section 8.3.2, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-05, Section 8.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. ASTM E 1527-05 requires *"All obvious uses of the property shall be identified from the present, back to the property's first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary and both reasonably ascertainable and likely to be useful."* (ASTM E 1527-05, Section 8.3.2) *Reasonably ascertainable means information that is publicly available, obtainable from a source within reasonable time and cost constraints, and practically reviewable.*

EPA's Standards and Practices for All Appropriate Inquiries (AAI), Section § 312.24, identifies the historical sources of information necessary to achieve the objectives and performance factors of § 312.20. According to AAI, *"historical documents and records may include, but are not limited to, aerial photographs, fire insurance maps, building department records, chain of title documents, and land use records."*

References

In order to address data gaps, additional sources of information may be consulted. According to the AAI, Section § 312.20 (g), *"to the extent there are data gaps (as defined in § 312.10) in the information developed...that affect the ability of persons (including the environmental professional) conducting the all appropriate inquiries to identify conditions indicative of releases or threatened releases...such persons should identify such data gaps, identify the sources of information consulted to address such data gaps, and comment upon the significance of such data gaps."* According to ASTM E 1527-05, Section 8.3.2.3, *"historical research is complete when either: (1) the objectives in 8.3.1 through 8.3.2.2 are achieved; or (2) data failure is encountered. Data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met....If data failure is encountered, the report shall document the failure and, if any of the standard historical sources were excluded, give the reasons for their exclusion."*

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